

Sims, Mark

From: Sims, Mark
Sent: Friday, August 08, 2014 9:08 AM
To: 'mnazemi1@aqmd.gov'
Subject: Supplemental 114 Information Request Letter Issued to Exide
Attachments: 114-Exide-Supplemental-08-07-2014.PDF

Hi Mohsen,

Attached is the supplemental 114 letter signed yesterday to Exide. We have clarified the request in the June 114 letter concerning differential pressure monitoring and we have narrowed our request for Title V permit applications. The revised requests are in Appendix B of the letter. If you have any questions, please give me a call. Thanks –

Mark
415-972-3965

Sims, Mark

From: Mohsen Nazemi <MNazemi1@aqmd.gov>
Sent: Monday, June 30, 2014 8:46 AM
To: Mohsen Nazemi; Johnson, Kathleen; Jones, Joel E.; Salazar, Matt; Sims, Mark
Cc: bwallerstein@aqmd.gov; kwiese@aqmd.gov; Bayron Gilchrist; Barbara Baird; Nancy Feldman; Teresa Barrera
Subject: Exide Lead Monitoring Data thru 6/23/2014
Attachments: '14 FncInRsIts-VernonCA.XLSM

Importance: High

Hi Kathleen, Joel, Matt and Mark. As a follow up to our last Friday's conference call with Kara, and in case you wanted to see the most recent ambient monitoring data before your 9:00 a.m. NOV Conference call with Exide, attached please find ambient monitoring data that I received from Exide this morning for the period through June 23, 2014. Please note that the data includes lead, as well as arsenic ambient data. Please share this with Kara and let me know if you have any other questions. Thanks.

Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance Office
South Coast Air Quality Management District
Phone No. (909)396-2662
Fax No. (909)396-3895
mnazemi1@aqmd.gov

From: MOPAS, Ed (Vernon) [<mailto:Ed.Mopas@exide.com>]
Sent: Monday, June 30, 2014 6:59 AM
To: Edwin Pupka; Nieto, Edward@DTSC; Andrew Lee; Philip Fine; Nieto, Edward@DTSC; Veile, Bill@DTSC; pruttan@dtsc.ca.gov; Chung Liu (Mit)
Cc: Andrea Polidori; Rudy Eden; David Jones; Mohsen Nazemi; Michal Haynes; Marco Polo; Payam Pakbin; Christopher Ravenstein
Subject: Exide hi-vol data thru 6/23/2014

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Sims, Mark

From: Mohsen Nazemi <MNazemi1@aqmd.gov>
Sent: Friday, June 27, 2014 1:39 PM
To: Johnson, Kathleen; Jones, Joel E.; Salazar, Matt; Sims, Mark
Cc: bwallerstein@aqmd.gov; kwiese@aqmd.gov; Bayron Gilchrist; Barbara Baird; Nancy Feldman; Teresa Barrera
Subject: RE: Exide Lead Monitoring Data thru 6/17/2014
Attachments: '14 FncInRsIts-VernonCA.XLSM; Rehrig-ATSF-Exide Mid_Pb data Nov_07 to June _15_2014_to Rudy.xlsx

Importance: High

Hi Kathleen, Joel, Matt and Mark. As a follow up to our last Tuesday's conference call, and as per your request, below and attached please find the most recent ambient monitoring data from Exide through June 22, 2014 (first attachment) that I just received this morning from Exide. I have also attached the most recent monitoring data that we have from SCAQMD's monitors around Exide through June 15, 2014 (second attachment). Please note that the data includes lead, as well as arsenic ambient data. Please let me know if you have any other questions. Thanks.

Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance Office
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mnazemi1@aqmd.gov

From: MOPAS, Ed (Vernon) [<mailto:Ed.Mopas@exide.com>]
Sent: Friday, June 27, 2014 7:06 AM
To: Edwin Pupka; Nieto, Edward@DTSC; Andrew Lee; Philip Fine; Nieto, Edward@DTSC; Veile, Bill@DTSC; pruttan@dtsc.ca.gov; Chung Liu (Mit)
Cc: Andrea Polidori; Rudy Eden; David Jones; Mohsen Nazemi; Michal Haynes; Marco Polo; Payam Pakbin; Christopher Ravenstein
Subject: Exide hi-vol data thru 6/22/2014

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From: Mohsen Nazemi
Sent: Monday, June 23, 2014 9:01 AM
To: Johnson, Kathleen; Jones, Joel E.; Salazar, Matt; Sims, Mark
Cc: Barry Wallerstein; Kurt Wiese; Bayron Gilchrist; Barbara Baird; Nancy Feldman; Teresa Barrera

Subject: Exide Lead Monitoring Data thru 6/17/2014

Importance: High

Hi Kathleen, Joel, Matt and Mark. Hope you all had a nice weekend. Matt, as per your last Friday's voice message request, attached please find the most recent submittal of the ambient Lead monitoring data measurements that Exide collects around their Vernon facility that I just received from Exide this morning. The data covers the period from December 2009 through June 17, 2014. Also as I indicated to you in my earlier message, in your voice message you had also asked for Exide's monthly reports for Rule 1420.1, however, Rule 1420.1 does not require submittal of monthly reports by Exide. Therefore, there are not such documents to provide to EPA.

Please let me know if there are other documents that EPA is interested in for preparation of your NOV conference call with Exide, scheduled for June 30, 2014. Thanks.

*Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
Tel. (909)396-2662
Fax (909)396-3895
mnazemi1@aqmd.gov*

From: MOPAS, Ed (Vernon) [<mailto:Ed.Mopas@exide.com>]

Sent: Monday, June 23, 2014 6:52 AM

To: Edwin Pupka; Nieto, Edward@DTSC; Andrew Lee; Philip Fine; Nieto, Edward@DTSC; Veile, Bill@DTSC;
pruttan@dtsc.ca.gov; Chung Liu (Mit)

Cc: Andrea Polidori; Rudy Eden; David Jones; Mohsen Nazemi; Michal Haynes; Marco Polo; Payam Pakbin; Christopher Ravenstein

Subject: Exide hi-vol data thru 6/17/2014

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Sims, Mark

From: Mohsen Nazemi <MNazemi1@aqmd.gov>
Sent: Monday, June 23, 2014 9:01 AM
To: Johnson, Kathleen; Jones, Joel E.; Salazar, Matt; Sims, Mark
Cc: bwallerstein@aqmd.gov; kwiese@aqmd.gov; Bayron Gilchrist; Barbara Baird; Nancy Feldman; Teresa Barrera
Subject: Exide Lead Monitoring Data thru 6/17/2014
Attachments: '14 FncInRsIts-VernonCA.xlsm

Importance: High

Hi Kathleen, Joel, Matt and Mark. Hope you all had a nice weekend. Matt, as per your last Friday's voice message request, attached please find the most recent submittal of the ambient Lead monitoring data measurements that Exide collects around their Vernon facility that I just received from Exide this morning. The data covers the period from December 2009 through June 17, 2014. Also as I indicated to you in my earlier message, in your voice message you had also asked for Exide's monthly reports for Rule 1420.1, however, Rule 1420.1 does not require submittal of monthly reports by Exide. Therefore, there are not such documents to provide to EPA.

Please let me know if there are other documents that EPA is interested in for preparation of your NOV conference call with Exide, scheduled for June 30, 2014. Thanks.

*Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance
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21865 Copley Drive
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From: MOPAS, Ed (Vernon) [<mailto:Ed.Mopas@exide.com>]
Sent: Monday, June 23, 2014 6:52 AM
To: Edwin Pupka; Nieto, Edward@DTSC; Andrew Lee; Philip Fine; Nieto, Edward@DTSC; Veile, Bill@DTSC; pruttan@dtsc.ca.gov; Chung Liu (Mit)
Cc: Andrea Polidori; Rudy Eden; David Jones; Mohsen Nazemi; Michal Haynes; Marco Polo; Payam Pakbin; Christopher Ravenstein
Subject: Exide hi-vol data thru 6/17/2014

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Sims, Mark

From: Mohsen Nazemi <MNazemi1@aqmd.gov>
Sent: Sunday, June 22, 2014 6:22 PM
To: Johnson, Kathleen; Jones, Joel E.; Salazar, Matt; Sims, Mark
Subject: Exide hi-vol data thru 6/16/2014
Attachments: '14 FnclnRslts-VernonCA.xlsm

Importance: High

Hi Kathleen, Joel, Matt and Mark. Hope you have had a nice weekend. Matt, sorry I haven't had a chance to get back to you earlier, but have been out of the office and just heard your voice message about Exide. As per your request, attached please find the ambient Lead monitoring data measurements at Exide from December 2009 through June 16, 2014. However, in your voice message you had also asked for the monthly reports for Rule 1420.1. Please note that Rule 1420.1 does not require submittal of monthly reports by Exide, therefore, there are not such documents to provide to EPA. Please let me know if there are other documents that you were interested in and wish you all a nice week. I will be speaking on three different panels at the AWMA National meeting in Long Beach next week, so will most likely be out of the office most of the week, but will check my email and voice mail. Thanks.

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mnazemi1@aqmd.gov*

Sims, Mark

From: Sims, Mark
Sent: Friday, June 20, 2014 11:02 AM
To: mnazemi1@aqmd.gov
Cc: Salazar, Matt; Jones, Joel E.
Subject: EPA 114 Letter to Exide (Issued Today)
Attachments: 114-Exide-06-20-2014.PDF

Hi Mohsen,

Attached is a copy of the 114 information request letter EPA issued today to Exide. We have asked Exide to respond by July 25, 2014. Feel free to call if you have any questions. Thanks –

Mark Sims
Air & TRI Enforcement Office (ENF-2-1)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3965

Sims, Mark

From: Sims, Mark
Sent: Thursday, May 22, 2014 1:08 PM
To: 'Jason Aspell'
Subject: EPA NOV to Exide
Attachments: NOV Exide 05-22-2014 w company & state letters.PDF

Hi Jason,

Attached is the NOV issued by EPA today to Exide alleging violations of SCAQMD SIP Rule 1420.1. I'll keep you posted on further developments.

Mark
415-972-3965

Sims, Mark

From: Sims, Mark
Sent: Thursday, October 24, 2013 10:59 AM
To: 'Jason Aspell'
Cc: 'Daniel Reich'
Subject: Ramcar Batteries (Additional Work Practices?)
Attachments: Exide-Letter-05-17-2013.PDF

Hi Jason,

Attached is a May 17 letter sent from South Coast to Exide, which you may or may not be aware of. Our question – any of the work practices that SCAQMD asked Exide to do (see attachment to the letter) would you like to see applied to Ramcar? Let us know. Thanks –

Mark
415-972-3965

From: Jason Aspell [<mailto:JAspell@aqmd.gov>]
Sent: Wednesday, August 07, 2013 7:56 AM
To: Sims, Mark
Subject: Ramcar Batteries

Mark,

As requested, here are some suggestions of potential measures that could be implemented at Ramcar Batteries in order to ensure that future operation of the equipment at the facility complies with the local District and Federal requirements, and that the operation is representative in regards to the operating conditions during compliance source tests. Please note that these items have not been reviewed by SCAQMD Management and are based solely on my own observations at this and similar facilities. They focus mostly on the collection efficiency issues at the plant. When the collection system is properly operating, the baghouses have demonstrated to control the lead emissions. Please review them to help determine their appropriateness and feasibility.

1. The facility operates seven air pollution control systems. The permits for these systems typically contain conditions for a minimum and maximum pressure drop across the control device to ensure proper control of contaminants. Although most of their permits require a pressure monitoring device, most of the systems do not have differential pressure limits. Implementing differential pressure limits at the levels recorded during recent source tests would ensure that the control equipment maintains a similar level of control efficiency as that measured during the test.
2. Smoke tests were used throughout the facility during the source tests to provide a qualitative determination of collection efficiency. Biannual or quarterly smoke tests should be performed to demonstrate that collection of the lead emissions is being maintained. The smoke test itself shall be conducted with a smoke generating device, and the smoke shall be released near the draft openings to the enclosures (e.g. lead pots, ovens and grid casters) or at the source of lead emissions (e.g. assembly, burning and stacking stations). All smoke shall be verified to be collected by the ventilation system. Photos and or/video of the tests should be submitted or maintained on site for inspection.
3. Another qualitative indicator of collection efficiency for the grid casters has been the size of flames within the grid caster. On several occasions, the flames were seen escaping the grid caster enclosures. If the flame is escaping the enclosure, then so are lead emissions. The flames can be checked and maintained continuously since there

are always workers in the vicinity when they are operating. Although this alone does not verify 100% collection efficiency, it can be used as a simple visual cue to help with collection.

4. The doors to the grid casters and lead pots shall be kept closed at all times unless maintenance is being performed or other access is required for the equipment. At all other times only the designed natural draft opening shall be opened (in the same condition as the most recent smoke test in Item No. 2). In addition, all doors and panels on hot processes should be made of an appropriate material to withstand the heat of the process. The flaps that were installed on the openings in 2013 are showing signs of warping since their installation. The Chief Engineer had indicated on 8/6/13 that they were working on making metal flaps and doors for this purpose.
5. In addition, the openings or doors to the enclosures shall be sized appropriately when maintained or replaced to ensure inward air flow into the enclosures. If the basic or air pollution control equipment has a permit condition requiring that it meet the recommendations in ACGIH's Industrial Ventilation, then the facility shall explicitly identify those standards and measure those parameters (typically with an anemometer) during the smoke testing in Item No. 2. This will add a quantitative measurement of collection efficiency in addition to the qualitative smoke test.
6. An annual visual inspection should be conducted, if not already required by rule, to identify any potential sources of lead leaks ducts and pots. This might prevent a situation involving the large leak of the lead pot on Permit No. D33381.
7. The company could implement a training program for their workers to identify and address potential problems with the collection ventilation. The workers are the people working directly with the equipment and seem to be the ones that adjust the dampers and flames for the equipment, which directly affects the collection of emissions. Many of the collection issues might have been prevented if the people working the equipment understood the consequences of the equipment adjustments they make.
8. Although all of the duct dampers on the roof had been welded or fixed into place*, there are several dampers in the building on the majority of equipment that are still easily adjustable. It is unclear if any of these have been changed since the source test and therefore it is unknown if collection efficiency has changed. It was noted to the Chief Engineer on 8/6/13 that the dampers should have something fixing them into position. If for some reason they cannot be fixed, then there should be a daily inspection to verify the proper damper positions. The closing of these dampers have been the cause of poor collection efficiency in the past.

*On the 8/6/13 visit to the facility, it was noted that a new damper had been added to the lead pot under D33382 that was not present during the Baghouse No. 4 source test. The setting of the damper could not be observed since a cover had been bolted down over the damper to prevent moisture and rain from entering the system. The equipment was not operating, so a smoke test could not be performed. No explanation was provided why the damper was installed.

9. The facility has Pitot tubes on several of the baghouse inlets to verify flow. It might be beneficial to install Pitot tubes or other types of differential pressure gauges on some of the collection branches closer to the equipment to verify a certain level of negative static pressure that can be read from a magnehelic gauge. This would be most beneficial on problematic equipment (in regards to collection efficiency) such as the grid casters and lead pots, if feasible.

Today's Air Quality Forecast

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